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September 20, 2023

Hon. Ruksanah L. Singh, U.S.D.J.
United States District Court
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

**Re: Jeffrey W. Kusmick v. Naji Abisleiman, et al.
Docket No. 3:23-cv-02219 (GC) (RLS)**

Joint Request for 30 day Adjournment of Rule 16 Conference

Dear Judge Singh:

I represent defendants Naji Abisleiman, The Estate of David Naim Abisleiman, Nadia Abisleiman, and REA LLC in the above-referenced matter. I write on behalf of plaintiff Jeffrey W. Kusmick and all of the defendants.

The parties hereby jointly request a 30 day adjournment of the Rule 16 Conference, which is currently scheduled for September 28, 2023 at 10:30am, so that they may have sufficient time to meet and confer, exchange the required information, and file a joint discovery plan.

In addition, since plaintiff previously advised Your Honor in his June 16, 2023 letter (D.E. 13-1) that he consents to the Conference being held remotely, the parties respectfully request that the Conference be held remotely.

Thank you for your anticipated cooperation.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.

/s/ Jan Alan Brody

JAN ALAN BRODY

September 20, 2023

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Via ECF

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